

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

WILLIAM C. DALLAS, *et al.*,

Plaintiffs,
v.

Hon. Nancy G. Edmunds

ALCATEL-LUCENT USA INC., a corporation,
Defendant.

Case No. 09-14596

**PETITION FOR APPOINTMENT OF KATHLEEN L. BOGAS
AS ADMINISTRATOR OF DALLAS QUALIFIED SETTLEMENT FUND**

1. Plaintiffs' counsel request that Kathleen L. Bogas, a licensed attorney in the state of Michigan since 1975, be appointed as Administrator of the Dallas Qualified Settlement Fund.
2. Ms. Bogas' qualifications for this position are as follows:
 - a. Ms. Bogas has distinguished herself as an attorney of the highest caliber throughout her career.
 - b. She has served on the Michigan State Bar Judicial Qualifications Committee for many years and most recently as Co-Chairperson.
 - c. She has served in the last three cycles on the merit selection committee for open positions for District Court judges for the Eastern District of Michigan.
 - d. She has served as President of the Michigan Association of Justice (formerly known as Michigan Trial Lawyers Association) and the National Employment Lawyers Association.

- e. She is a Fellow of the American College of Labor and Employment Lawyers, a member of the American Board of Trial Advocates and the American College of Trial Lawyers.
- f. She has served as a neutral mediator, arbitrator and facilitator in scores of matters.
- g. She has been appointed by Judge Lawson as a neutral case evaluator in the settlement of a class action pending before him. *Rose v Saginaw Sheriff*. She was also appointed by Chief Judge Gerald Rosen as a mediator/master in the case of *Tankersley v Ameritech Publishing*.
- h. She was awarded the Champion of Justice Award by the State Bar of Michigan in 2012.
- i. She has received the Respected Advocate Award from the Michigan Defense Trial Counsel, the Jean King Leadership Award from the Women Lawyer's Association of Michigan and the Earl Kline Award from the Negligence Section of the State Bar of Michigan.
- j. She has been appointed by various state and federal authorities to numerous other committees and leadership positions all in recognition of her skills, abilities and integrity.

Accordingly, plaintiffs' counsel request that Kathleen L. Bogas be appointed as the Dallas Qualified Settlement Fund Administrator and order that no indemnification bond is required.

PITT, McGEHEE, PALMER, RIVERS &
GOLDEN

By: /s/ Beth M. Rivers (P33614)

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